FILED: ROCKLAND COUNTY CLERK 04/03/2019 03:23 PM

NYSCEF DOC. NO. 15

INDEX NO. 031783/2019

RECEIVED NYSCEF: 04/03/2019

AFFIDAVIT OF L. V. G.

STATE OF NEW YORK)
) ss:s
COUNTY OF ROCKLAND	1

- L. V. G., being duly sworn, hereby states and deposes under pains and penalties of perjury:
- 1. I make this Affidavit from personal knowledge and in support of plaintiffs' application for a temporary restraining order. My wife, D. S. G., and I have four children in Green Meadow Waldorf School. Two boys, age 11, in 5th grade and two girls, age 9 in 3rd grade. We began attending GMWS Parent Child classes when the boys were 1 year old and since then all of our children have been enrolled starting in Kindergarten.
- 2. When we found GMWS we did not know much about Waldorf education. However, we started to learn as much as we could. We were so impressed with the school, the staff, speaking with current students of varying ages, seeing their work and listening to the experiences of parents that we wanted our children to attend.
- 3. We chose Waldorf education because it was clear to us that graduates of this education system are confident, creative thinking individuals with the courage to change the world. They go on to rewarding careers and continue to value learning, work, relationships and an ethical approach to their chosen path.

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4. Economic, gender, racial and religious diversity are the thread of the social fabric that Waldorf schools thrive on. Although Waldorf schools are not religious in the sense of representing a specific denomination, the Waldorf movement was born out of a spiritual idea-that humanity has evolved due to the dynamic between spiritual wisdom and earthly work and that each child will also develop on this path before having their own capacity to advance it themselves. The children celebrate the changing seasons, rites of passage, diverse cultural festivities and more human ways of working together to show children that we are all equal under the sun, we all develop wisdom, have something to share and are part of a much larger whole.

- 5. Many of these values align with Christianity, our religious belief structure. However, our religion takes us farther in some areas than Waldorf education does. For example, our belief in the commandments, including "thou shalt not kill" and our pro-life perspective being firmly against abortion.
- 6. Knowing that many vaccines are derived from or contain aborted fetus cells, our religious beliefs dictate that we must not allow these substances in our bodies as it would mean we were complicit with the murder of a life in fetal form.
- 7. As a result of our religious beliefs, we have sought and obtained religious exemptions from vaccination. However, through its exclusion order, the Department of Health in Rockland County is preventing our children from attending the school. Our religious exemptions were wiped out despite the absence of a single case of measles in our school community.

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8. This discrimination has caused hardship for our family beyond what I

could have ever imagined an event like this would have. I have been unable to

seek employment, dedicating my time to educating four children in two

different grades. My children are suffering and on a daily basis demonstrate

clear signs of struggle around this issue. They don't understand why they are

being forced into a situation where they cannot see any of the friends they've

been with for many years in school. They miss their teachers and desperately

want to engage in learning with their class. They have emotional outbreaks

questioning the exclusion. They have anxiety and fear around being forced to

receive a shot that will affect their eternal lives and are deeply afraid that they

may wind up being taken away from their family as a result of our religious

beliefs. No child should endure this level or stress and duress.

9. WHEREFORE, I respectfully request that the Court vacate this

exclusion order and allow our children to return to school.

V. G. Signed and sworn to before me this _5

day of March 2019

MOTARY PUBLIC

MY COMMISSION EXPIRES:

MICHAEL HOWARD SUSSMAN Notary Public, State of New York No. 02SU6332584 Qualified in Orange County Commission Expires Nov. 09, 20

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